

STATEMENT OF WORK FOR REMEDIAL DESIGN OVERSIGHT
North Bronson Industrial Area, Bronson, Michigan
Statement of Work Revision No. 2
September 5, 2000

EPA Region 5 Records Ctr.



273975

Introduction

Site Description

The North Bronson Industrial Area Superfund site (the site) is a two hundred-acre parcel located in the city of Bronson, Branch County, Michigan. The site occupies the northern (industrial) area of the city of Bronson, it is bounded to the east by Lincoln Street as projected northward to County Drain #30 (CD #30), to the north by CD #30, to the west by Burr Oak Road as projected north by CD#30, and to the south by Fillmore and Union Streets. The predominant features of the site are two sets of seepage lagoons located in the northeast and northwest sections of the site, and CD#30.

Contamination detected at the site is the result of industrial activity and waste handling practices in the North Bronson area since the early 1900's. Initially, several industries discharged plating and other industrial wastes directly into CD#30. To reduce the amount of contaminants entering the drain, the city of Bronson constructed seepage lagoons to retain the waste generated by industry. An industrial sewer system was also constructed and used to convey waste from the facilities to the lagoons.

In June 1984, the U.S. EPA ranked the site for inclusion on the National Priorities List (NPL) and in June 1986, the site was made final on the NPL. The Remedial Investigation and Feasibility Study was funded by U.S. EPA and performed by Michigan Department of Environmental Quality (MDEQ) (formerly Michigan Department of Natural Resources). Remedial Investigations started in mid-1987 and were completed in September 1993 for Operable Unit I, and the Feasibility Study was completed in May 1995. In July 1997 the MDEQ completed a FS Addendum. This addendum updates the cleanup goals to reflect amendments to Michigan law in June 1995, presents an additional groundwater remediation alternative for the site, and identifies the industrial sewer as a potential source of contamination at the site requiring further study. This Industrial sewer and any media impacted by the sewer are identified as Operable Unit II.

Purpose

The purpose of this work assignment is to obtain contractor support for the oversight of the remedial design (RD) at the North Bronson Industrial Area Superfund site. Implementation of the RD shall be performed by the Potentially Responsible Parties (PRPs). The purpose of SOW revision no. 1 is to document the changes or clarifications made during the June 9, 1999 kick-off meeting. The purpose of SOW revision no. 2 is to clarify the extent of RD field oversight under Task 3.2.1, clarify activities under Task 3.2.2 and Task 7.2.1, and to provide for a presentation of the intermediate design under Task 7.2.2.

Description of the RD

The work to be implemented by the Respondents shall include, but is not limited to, the following components:

- a. Fencing in the western lagoon area and the treatment wetland to control risks to human health and the environment associated with exposure to contaminants;
- b. Excavation of eastern lagoon sludge and soil and filling the excavated area with clean soil;

- c. Dredging of sediment from CD #30.
- d. Consolidating contaminated waste from the eastern lagoon and CD #30 into the western lagoons;
- e. Covering the western lagoons to control risks to human health and the environment associated with exposure to contaminants;
- f. Installing a French Drain between the western lagoons and CD #30 to capture contaminated groundwater;
- g. Pumping contaminated water from the French Drain;
- h. Constructing a treatment wetland to treat contaminated water collected by the French Drain. The goal for groundwater extraction and treatment is to reduce the concentration of contaminants to comply with state and federal surface water discharge criteria;
- i. Discharging treated water from the treatment wetland to CD #30;
- j. Monitoring groundwater and surface water quality to assess the effectiveness of the remedy;
- k. Marking the western lagoon area and the treatment wetland with permanent site markers;
- l. Placing enforceable restrictions on future land and groundwater use;
- m. Pre-design, additional and supplemental investigations/studies; and
- n. correction of work deficiencies;

It is envisioned that a modification will be made to the Record of Decision to include a contingency for the remedy which will allow for an alternative method of groundwater treatment if the selected remedy does not meet the selected clean-up standards. However, this modification does not fundamentally alter the overall approach intended by the remedy, and would be typical of the type of changes that occur during the remedial design process.

Objectives of Oversight

The primary objective of PRP oversight is to ensure that the remedies specified in the RD and used in the remedial action (RA) protect public health and the environment during the life of the project and are implemented in compliance with the terms of the Settlement Agreement. Oversight meets its objectives by observing and documenting that the PRP has complied with all applicable laws, regulations, and requirements, and has met all performance standards specified in the Settlement Agreement.

General Requirements

The contractor shall conduct the RD Oversight in accordance with this SOW and to ensure consistency with the ROD issued on June 19, 1998, the Settlement Agreement (CD or AOC), the *Remedial Design and Remedial Action Handbook (DRAFT)* (USEPA Office of Solid Waste and Emergency Response Directive, August 1993) and all other guidance used by USEPA in conducting an RDRA. See references listed in Attachment 2.

A summary of the major deliverables and the schedule for submittal is attached. See Attachment 1.

The contractor shall furnish all necessary and appropriate personnel, materials, and services needed, or incidental to, performing and completing the RD oversight. This especially includes personnel familiar with the design and construction of wetlands for treatment; phytoremediation; sediment and soil excavation and consolidation, cap construction, and groundwater remediation.

A list of primary guidance and reference material is attached. See Attachment 2. In all cases, the contractor shall use the most recently issued guidance.

The contractor shall maintain oversight files as specified in the contract and by the Work Assignment Manager or Remedial Project Manager (WAM/RPM). The WAM/RPM may periodically audit the site files and record-keeping procedures.

The contractor shall communicate at least weekly with the WAM/RPM, either in person or through conference calling, to report on oversight progress.

The contractor shall notify the WAM/RPM when 75 percent in accordance with the contract and when 95 percent of the approved work assignment budget has been expended.

USEPA will provide oversight of PRP contractor activities throughout the RD oversight efforts. USEPA review and approval of the contractor's deliverables is a tool to assist this process and to satisfy, in part, USEPA's responsibility to provide effective protection of public health, welfare, and the environment during the Contractor's oversight of the PRP's remedial activities. USEPA will review the deliverables prepared during the course of the work assignment to assess the likelihood that the RD will achieve its remediation goals and that all performance requirements applicable to the RD have been correctly identified and implemented. However, acceptance of deliverables by USEPA does not relieve the contractor of responsibility for the adequacy of the deliverable.

Record-Keeping Requirements

The contractor shall maintain all technical and financial records for the RD Oversight work assignment in accordance with the contract. At the completion of the work assignment, the contractor shall submit 1 copy of the official record of the remedial design oversight in hardcopy form in accordance with the information contained on the Work Assignment Completion Notification (WACN).

Equipment Transfer

At the completion of the work assignment or when government personal property is no longer required at the site, the contractor shall arrange for the proper disposition of government-furnished or contract-acquired property (purchased with contract funds) in accordance with the contract requirements. The disposition (transfer, sale, or abandonment) of government personal property and the tracking of such equipment shall be coordinated with the Contract Property Administrator. For additional information, refer to *Contractor's Guide for Control of Government Property*, Office of Administration and Resource Management, December 1988.

USEPA Primary Contact

The primary contact for this work assignment is Rosita Clarke-Moreno who is the Work Assignment Manager (WAM). The WAM can be reached at (312) 886-7251 or via telefax at (312) 353-5541 or via the Internet at clarke.rosita@epa.gov. The secondary contact is Sally A. Averill. She can be reached at (312)

886-4439 or via telefax at (312) 353-5541 or via the Internet at averill.sally@epa.gov. The mailing address is U.S. EPA Region V, Mailcode: SR-6J, 77 West Jackson Blvd., Chicago IL 60604.

WA Completion Date & Project Closeout

The completion date for this work assignment is estimated to be 04/30/01. At the completion of the work assignment, the contractor shall perform all necessary project work assignment closeout activities as specified in the Contract. These activities may include closing out any subcontracts, indexing and consolidating project records and files as required above, and providing a technical and financial closeout report to USEPA. Final costs shall be reported to EPA (in hard copy form and on disk) broken down into the cost for each element of the Work Breakdown Structure (WBS) (Attachment 2) for this work assignment.

Task 1 Project Planning and Support

- 1.1 Project Planning. This task includes efforts related to project initiation.
 - 1.1.1 Attend Kickoff Meeting. The contractor shall contact the RPM within 5 calendar days after receipt of the work assignment to schedule the kickoff meeting. The contractor shall attend and participate in a kickoff meeting conference call to be held at the USEPA Region 5 Office in Chicago, Illinois after receipt of the work assignment. It is anticipated that 2 - 3 contractor personnel will participate in attend the kickoff meeting.
 - 1.1.2 Conduct Site Visit. The contractor shall conduct a one-day site visit with the USEPA WAM/RPM during the project planning phase to develop a conceptual understanding of the site and the RD scope and requirements. It is anticipated that 2 contractor personnel will attend the site visit.
 - 1.1.3 Evaluate Existing Information and PRP Plans. The contractor shall obtain, copy, and review available information pertaining to the site from USEPA and PRP Plans. The contractor shall not provide formal comments on documents which have already gone through the sign-off stage, such as ROD, RI, FS, etc., and shall not provide formal comments on the CD. The contractor shall obtain the necessary information from the RPM. The contractor shall evaluate or review the existing data and documents, including:
 - Record of Decision (review only)
 - RI, Feasibility Study and FS Addendum (review only)
 - Technical Memorandum - OU II (review only)
 - Consent Decree and SOW (review only)
 - 1.1.4 RD Oversight Work Plan
 - 1.1.4.1 Develop RD Oversight Work Plan. The contractor shall prepare and submit a RD Oversight Work Plan within 30 calendar days after receipt of the work assignment (WA). The contractor shall use information from the USEPA-approved PRP Work Plan, appropriate USEPA guidance, and technical direction provided by the USEPA WAM/RPM as the basis for preparing the RD Oversight Work Plan. RD oversight work must be coordinated and properly sequenced with USEPA and PRP RD activities. The contractor shall submit one copy of the work plan to the Contracting

Officer (CO), Project Officer (PO) and Work Assignment Manager (WAM).

Develop Narrative. The RD Oversight Work Plan shall include a comprehensive description of project tasks, the procedures to accomplish them, project documentation, and project schedule. The contractor shall use their quality assurance/quality control (QA/QC) systems and procedures to assure that the work plan and other deliverables are of professional quality requiring only minor revisions. Specifically, the Work Plan shall include the following:

- ◆ Identification of RD project elements and the associated oversight tasking including review of PRP planning, design, and activity reporting documentation; field sampling and analysis activities, and treatability study activities. Output of this task will be a detailed work breakdown structure of the RD oversight project.
- ◆ The contractor's technical approach to each task to be performed, including a detailed description of each task; the assumptions used; any information to be produced during and at the conclusion of each task; and a description of the work products that will be submitted to USEPA. Information shall be presented in a sequence consistent with SOW.
- ◆ A schedule with specific dates for completion of each required activity and submission of each deliverable required by the SOW. This schedule shall also include information regarding timing, initiation, and completion of all critical path milestones for each activity and deliverable and the expected review time for USEPA.
- ◆ A list of key contractor personnel providing support on the work assignment.

1.1.4.2 Prepare Revised Oversight Work Plan (if necessary)

- 1.1.4.2.1 Attend Fact Finding/Negotiation Meeting. The contractor shall attend a Work Plan fact finding/negotiation meeting at the Region 5 office. USEPA and the Oversight Contractor will discuss and agree upon the final technical approach and costs required to accomplish the tasks outlined in the SOW.
- 1.1.4.2.2 Prepare & Submit Revised Oversight Work Plan. The contractor shall prepare and submit a revised work plan incorporating the agreements made in the fact finding/negotiation meeting.

1.1.5 Review PRP Plans. The contractor shall review and provide comments on the following PRP planning documents

1.1.5.1 PRP Health and Safety Plan. The contractor shall review the PRP's Draft Health & Safety Plan.

1.1.5.2 PRP Sampling and Analysis Plan. The contractor shall review the PRP's draft and final Sampling and Analysis Plan. The contractor's review shall include the PRP's Quality Assurance Project Plan and Field Sampling Plans as outlined below.

1.1.5.2.1 PRP Quality Assurance Project Plan (QAPP)

1.1.5.2.2 PRP Field Sampling Plan (FSP)

1.1.5.3 Pre-Design Studies WorkPlan. The contractor shall review the PRP's draft and final/revised Pre-Design Studies Workplan.

1.2 Preparation of Site-Specific Plans

1.2.1 Develop Health and Safety Plan (HASP). The contractor shall prepare a site-specific HASP that specifies employee training, protective equipment, medical surveillance requirements, standard operating procedures, and a contingency plan in accordance with 29 CFR 1910.120 1(1) and (1)(2). Whenever possible, the contractor shall use the HASP developed by the PRP's.

1.2.2 Develop Sampling and Analysis Plan (SAP). N/A

1.2.3 Develop Quality Assurance Project Plan (QAPP). N/A

1.3 Project Management

The contractor shall perform general work assignment management including management and tracking of costs, preparation of Monthly Progress Reports, attendance at project meetings, and preparation and submittal of invoices. It is anticipated that the period of performance for this project is from June, 1999 through April, 2001.

If the contractor finds that the RD differs significantly from the ROD, the construction or implementation is not consistent with the design, requirements delineated within the Settlement Agreement (CD or AOC) are not being met, or that there are compliance issues with applicable or relevant and appropriate requirements (ARARs) at any point in the process, the contractor shall notify the WAM/RPM immediately to describe the issue.

1.3.1 Monthly Project Management and Reporting. The contractor shall provide general work assignment management and coordination to implement the work assignment SOW. The contractor shall prepare monthly progress reports in accordance with the requirements under the contract. The contractor shall manage and track costs and prepare and submit invoices. The contractor shall report costs and level of effort (by P-level) for the reporting period as well as cumulative amounts expended to date. Periodically, during the life of the work assignment, the WAM may request actual costs to date by WBS element. For budgeting purposes, the contractor shall assume (1) of these requests

1.3.2 Meetings. The contractor shall participate in progress meetings during the course of the work assignment. For budgeting purposes, the contractor shall assume (4 2) meetings in Chicago, with (2) people in attendance, for (8) hours. This assumes hours for preparation, travel and attendance in meetings.

1.4 Subcontract Procurement and Support Activities. N/A

Task 2 Community Relations Technical Support

This task includes technical support provided by the contractor during public/availability meeting(s) under the

associated community relations work assignment. The contractor shall provide community relations support to USEPA throughout the RD in accordance with *Community Relations in Superfund-A Handbook*, June 1988. For budgeting purposes the contractor shall assume that (2) staff will provide technical support at (2) public/availability meeting(s) and each meeting requiring an overnight stay.

Task 3 Data Acquisition/RD Oversight

3.1 Mob/Demob Oversight N/A

3.2 Perform RD Field Oversight

3.2.1 RD Field Investigation Oversight. Contractor shall perform field oversight for pre-design studies investigation. It is anticipated that ~~6 months~~ 12 weeks of field work would take place. During design of wetland cells, field pilot studies might be required. Contractor shall plan for field oversight for these activities. Contractor shall plan for field oversight for these activities for 1 person 3 days/week, assuming ½ day of travel each way.

3.2.2 On-going Periodic RD Field Oversight. Contractor shall provide for periodic field oversight ~~as needed based on PRP's pre-design studies workplan~~. Pending the results of the pre-design studies. No hours shall be budgeted at this time.

3.2.3 Prepare Field Investigation Oversight Reports.

3.2.3.1 Contractor shall prepare periodic field oversight reports every 2 weeks.

3.2.3.2 A Final Summary Report of Field Oversight activities shall be prepared by the Contractor.

Task 4 Analysis of Split Samples N/A

Task 5 Analytical Support and Data Validation of Split Samples N/A

Task 6 Data Evaluation of Split Samples N/A

Task 7 Review of PRP Remedial Design Documents

This task involves work efforts to review and comment on PRP RD submittals. The contractor shall perform reviews to focus on the technical and engineering merit. Comment reports will be submitted upon the completion of each review by the oversight contractor in accordance with the schedule provided in Attachment 1, identifying specific issues and suggested corrective action. The following factors are to be considered during the review of all PRP submittals:

- Technical requirements of the ROD, Unilateral Administrative Order (UAO), Administrative Order of Consent (AOC), CD, and compliance with ARARs
- Standard professional engineering practices
- Applicable statutes, USEPA policies, directives and regulations
- Spot checking design calculations to assess accuracy and quality of design activities
- Examination of planning and construction schedules for meeting project completion goals

7.1 Review PRP PreDesign Documents. The contractor shall review the PRP-prepared predesign, design, and remedial action (where applicable) project documentation to ensure professional quality,

technical accuracy, compliance with the PRP RD Work Plan, the ROD and Unilateral Administrative Order, CERCLA, and all ARARs. Specific documents to be required include

7.1.1 Interim Results Deliverables [e.g., Treatability Study Work Results]. The contractor shall review and provide comments on any PRP interim design deliverables.

- Review of draft and final Pre-Design Studies Report

7.1.2 Other Non-Specific PRP Design Deliverables. The contractor shall budget 200 LOE for this effort.

7.2 Review PRP Remedial Design Documents

7.2.1 Review Preliminary Design. The contractor will review and comment on the PRP Design WorkPlan, PRP Pre-Design WorkPlan, and the Preliminary Design. The Preliminary Design shall include a review of the Project Delivery Strategy and Scheduling, Preliminary Construction Schedule, Specifications Outline, Preliminary Drawings Basis of Design Report/Design Analysis, Preliminary Cost Estimate, and PRP Description of Variances with the ROD.

The contractor shall participate in a preliminary design review briefing. This meeting will take place in the USEPA regional office and last approximately half of a day. It is anticipated that approximately 2 – 3 contractor personnel will be in attendance.

~~The contractor shall review and provide comments on the PRP revised preliminary design (if applicable).~~

~~The contractor shall participate in a revised preliminary design review briefing via a conference call. This conference call will last approximately 1-2 hours. It is anticipated that approximately 1 – 2 contractor personnel will be in attendance.~~

7.2.2 Review Intermediate Design Documents. The contractor's review and comment of the Intermediate Design shall include a review of the Construction Schedule, Preliminary Specifications, Intermediate Drawings, Basis of Design Report/Design Analysis, Revised Cost Estimate, and PRP Description of Variances with the ROD if submitted. As necessary, the PRP Group has the option of not submitting an entire report, but only crucial and specific information for design of remedy. The PRPs would conduct a presentation to cover those topics not covered in a written submittal.

The contractor shall participate in an intermediate design review briefing/presentation. This meeting will take place in the USEPA regional office and last approximately 1 day. It is anticipated that approximately 2 – 3 contractor personnel will be in attendance.

The contractor shall review the PRP response to design review comments, and submit comments on the PRP's response.

7.2.3 Review Prefinal/Final Design. The contractor's review and comment of the Prefinal Design shall include a review of the Prefinal Design Specifications, Prefinal Drawings, Basis of Design Report/Design Analysis, Revised Cost Estimate.

The contractor shall participate in a prefinal design review conference call. The conference

call will last approximately 2-3 hours. It is anticipated that approximately 1 - 2 contractor personnel will be in attendance at each meeting.

- 7.2.4 Review Final Design. The contractor shall review and comment of the Final Design. This shall include a review of the Final Design Specifications, Final Drawings, Basis of Design Report/Design Analysis, Final Cost Estimate.
- 7.2.5 The contractor shall review any PRP subcontract award document(s) available for review. This review may include reviews of the biddability (offerability) and constructability reviews and a revised project delivery strategy. The contractor shall assume 20 LOE for this effort.
- 7.2.6 The contractor shall review other PRP non-specific RD documents available for review. The contractor shall assume 150 LOE for this effort.

7.3 Review PRP Remedial Action Documents. N/A

Task 8 Remedial Action Oversight N/A

Task 9 Technical Meeting Support

This task includes work efforts related to attendance at and documentation of meetings with USEPA, PRPs, the PRP contractor, and the State Agency. The contractor shall attend various meetings throughout the performance of the work assignment. These meetings are in addition to the meetings specifically included within other tasks in this SOW. Meetings may be scheduled to coincide with the following specific milestones during the RD; at the PRP RD work plan review, in between design submittal reviews, before initiating on-site field sampling and treatability studies during the design phase, or at completion of all sampling during design activities. For budgeting purposes the contractor shall assume 4 meetings. It is anticipated that at least half the meetings would take place in Bronson, Michigan and the other half in the USEPA regional office and last approximately half of a day each. It is also anticipated that approximately 1 - 2 contractor personnel will be in attendance at each of these meetings.

Task 10 Work Assignment Closeout

The contractor shall perform the necessary activities to close outwork assignment in accordance with contract requirements.

- 10.1 Package and Return Documents to Government. The contractor shall package and return all documents to EPA.
- 10.2 Prepare Closeout Report. The contractor shall prepare a Work Assignment Closeout Report (WACR). The WACR shall include all LOE by p-level and costs in accordance with the WBS. The contractor shall provide an electronic copy of the most recent mailing list to the WAM concurrent with submittal of the WACR.

Attachment 1
Summary of Major Submittals for the Remedial Design Oversight at
North Bronson Industrial Area Site, Bronson, Michigan


| TASK | DELIVERABLE | NO. OF COPIES | DUE DATE (in calendar days) |
|------------------|---|----------------------|--|
| 1.1.4.1 | RD Oversight Work Plan | 3 | 30 days after receipt of work assignment (WA) |
| 1.1.4.2 | Revised RD Oversight Work Plan (if necessary) | 3 | 15 days after meeting/agreement of USEPA comments |
| 1.1.5.1 | Comments on PRP H&S Plan | 2 | 21 days after receipt of document |
| 1.1.5.2.1 | Comments on PRP QAPP | 2 | 21 days after receipt of document |
| 1.1.5.2.2 | Comments on PRP FSP | 2 | 21 days after receipt of document |
| 1.1.5.2.3 | Comments on PRP Pre-Design Studies Work Plan | 2 | 30 days after receipt of document |
| 1.1.5.2.3 | Comments on Revised PRP Pre-Design Studies WorkPlan | 2 | 21 days after receipt of document |
| 1.2.1 | Health & Safety Plan | 2 | 30 days after receipt of WA |
| 1.3.1 | Monthly Progress Reports | 3 | In accordance with the requirements of the contract |
| 1.3.1 | Ad hoc financial information requests | 1 | 14 days after WAM request |
| 3.2.3.1 | Periodic Field Oversight Reports | 2 | 10 days after each 2 week field oversight event. |
| 3.2.3.2 | Final Summary Field Oversight Report | 2 | 21 days after the end of all field oversight activities |
| 7.1.1 | Comments on Interim Design Documents | 2 | 30 days after receipt of PRP Pre-Design Documents |
| 7.1.2 | Other Non-Specific PRP Deliverables | 2 | 30 days after receipt of PRP Deliverable |
| 7.2.1 | Comments on PRP Preliminary Design Documents | 2 | 30 days after receipt of PRP Preliminary Design documents |
| 7.2.1 | Comments on PRP Revised Preliminary Design | 2 | 15 days after receipt of PRP Response |
| 7.2.2 | Comments on PRP Intermediate Design Documents | 2 | 30 days after receipt of PRP Intermediate Design Documents |
| 7.2.2 | Comments on PRP Response of Intermediate Design | 2 | 15 days after receipt of PRP Response |

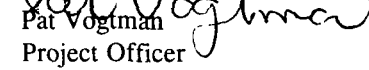
| TASK | DELIVERABLE | NO. OF COPIES | DUE DATE (in calendar days) |
|-------------|---|----------------------|--|
| 7.2.3 | Comments on PRP Prefinal Design Documents | 2 | 30 days after receipt of PRP Prefinal Design Documents |
| 7.2.4 | Comments on PRP Final Design Documents | 2 | 15 days after receipt of PRP Final Design Documents |
| 7.2.5 | Comments on PRP Subcontract Award Documents | 2 | 15 days after receipt of PRP Subcontract Award Documents |
| 7.2.6 | Comments on other PRP non-specific RD documents | 2 | 30 days after receipt of document (s) |
| 10.2 | Work Assignment Closeout Report | 3 | As directed in Work Assignment Closeout Notification |

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: September 5, 2000

SUBJECT: Revised Statement of Work dated September 5, 2000, Bronson, Michigan, Remedial Design Oversight, RAC - Roy F. Weston, Inc. Name, Work Assignment Number 031-ROBE-051C

FROM: Rosita Clarke-Moreno 
Work Assignment Manager

THRU: Pat Vogtman 
Project Officer

TO: Claudea Heise
Contract Specialist

When the work assignment was initiated, the Agency was expecting a signed Record of Decision within a matter of a few weeks at most. Subsequently, EPA identified North Bronson as one of the sites whose analytical data may have been compromised because of Agency issues with the Central Regional Laboratory (CRL) Program. Until the problems with the CRL could be reconciled, the Department of Justice could not enter the Consent Decree which triggers the start of the Remedial Design. The Consent Decree was finally entered into February 2000 and the PRP's are now in the process of submitting all of their planning documents, e.g. work plan, Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), and pre-design work plan. Based on my review of these documents, I have initiated action to revise the Statement of Work and revise the ICGE accordingly. U.S. EPA If you have any questions, please contact me at (312) 886-7251.

Attachments